



THE RADIO CORPORATION

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July 28, 1999

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Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S. W.
Washington, DC 20554

Re: Informal comments on proposed Low Power Radio (MM Docket No. 99-25)

Dear Secretary,

The Radio Corporation, licensee of six (6) FM stations and two (2) FM translator stations in the central New York State area, is opposed to the creation of any kind of low power FM (LPFM) service within the present FM band, especially if protection from interference is reduced.

For example, the effectiveness of the FM translator stations we operate, which are extremely important in filling gaps within the main service areas of our associated primary stations, could be severely compromised even if adjacent channel separation were not reduced to allow LPFM. As we understand it, circumstances could exist under the proposed rules whereby an applicant for an LPFM could force our translator stations off the air due to their secondary service status.

We feel that any reduction in interference protection to existing stations would certainly not be in the public interest since areas would be created where neither the existing station nor the new LPFM station is received properly. This would reduce the number of stations that could be received in that area and would deprive the public of choices of stations rather than increase the choices.

Perhaps there is a need for some kind of low power broadcasting service. We do not feel that it should be within the present AM or FM broadcasting bands but do feel that it needs to be in a frequency band for which a significant number of

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receivers exist or are available. We feel that the 30 - 50 mhz land-mobile communications band, while many licenses may exist, is significantly underutilized due to the migration of the services within this band to higher frequencies. We believe that frequencies within this band could be shared with low power broadcasting stations as similarly proposed within the FM band. Receivers for this band exist in the hands of the public in the form of VHF monitoring radios and are still currently being manufactured. If broadcasting were allowed in this band, and listeners began using monitor radios to receive the broadcasts, we feel AM and FM receiver manufacturers would be inclined to include this band as well. Broadcasting within this band should be non-commercial in nature conducted by individuals and organizations operating strictly as a public service.

For example, when the NOAA weather service started broadcasting on VHF, listeners began receiving the broadcasts on their monitor receivers, then, manufacturers began making this band available on entertainment receivers and are now even making receivers specifically for this service. We think the same thing would happen if a low power or micro-power broadcasting service were available on the 30 - 50 mhz band.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ed F. Levine', with a stylized flourish at the end.

Edward F. Levine, President
The Radio Corporation



City of Albuquerque

P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

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August 2, 1999

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**VIA Facsimile 202-418-0307
and Federal Express**

Magalie R. Salas, Esq.
Office of the Secretary of the FCC
1919 M. Street, NW, Room 222
Washington, DC 20554

RE: Notice of Proposed Rulemaking; MM Docket No. 99-25

Dear Ms. Secretary:

I am a City Councillor for the City of Albuquerque, New Mexico. On July 23, 1999, I attended a meeting of the Local and State Government Advisory Committee ("LSGAC") to the Federal Communications Commission ("FCC"). Please be informed that during this meeting I had a very brief conversation with Commissioner Harold W. Furchtgott-Roth specifically concerning the subject of my support for low power FM and also my support for the creation of low power FM commercial service. Both issues are currently before the FCC in MM Docket No. 99-25.

If you require additional information, please feel free to contact me at 505.768.3100.

Respectfully submitted,

Michael Brasher
by Ellen C. O'Brien

Michael Brasher
City Councillor
District 9

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